



THE CITY OF NEW YORK
LAW DEPARTMENT
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Hon. Sylvia O. Hinds-Radix
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August 25, 2023

BY ECF

Honorable Steven L. Tiscione
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: William R. Nolan v. City of New York, et. al.
19-CV-00187 (RPK)(ST)

Dear Judge Tiscione:

I am an attorney in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I submit this letter on behalf of the City of New York, (Ret.) Chief Joseph Reznick, (Ret.) Chief Raymond Spinella, Inspector Michael Barreto, Captain Asif Iqbal, (Ret.) Detective James Butler, and Police Officer Bryan Burgess (collectively “City Defendants”) to seek additional time to respond to the Second Amended Complaint.

The Second Amended Complaint names six current or former police officers with the New York City Police Department as defendants in their official and individual capacities and contains one hundred seventy-six (“176”) paragraphs and eleven (“11”) causes of action stemming from an alleged series of incidents beginning in 2017. Specifically, Plaintiff alleges that his complaints to the NYPD regarding the alleged harassing conduct of Defendant Jose Rodriguez went unanswered and that the NYPD engaged in a number of retaliatory actions against Plaintiff, including suspension of his handgun license, confiscation of said license and associated handguns, and arrests on December 20, 2018 and January 14, 2020.

Counsel for City Defendants has worked diligently to review and investigate the allegations in the Second Amended Complaint by interviewing the individually named NYPD officers, speaking with numerous other employees of the City of New York, and reviewing dozens of documents. However, given the fact-intensive nature of the Second Amended Complaint, additional time is necessary to receive requested documents and interview City employees who have been unavailable due to scheduled vacations.

For this reason, I respectfully request a two-week extension, from August 30, 2023 to September 13, 2023, to respond to the Second Amended Complaint. I have obtained counsel for Plaintiff's consent to this request.

Thank you in advance for your consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Nicholas Ciappetta", with a stylized flourish extending to the right.

Nicholas Ciappetta
Senior Counsel